

NICHOLAS A. TRUTANICH  
United States Attorney  
Nevada Bar Number 13644  
ELIZABETH O. WHITE  
Assistant United States Attorney  
400 South Liberty #900  
Reno, Nevada 89501  
[Elizabeth.O.White@usdoj.gov](mailto:Elizabeth.O.White@usdoj.gov)  
775-784-5438  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, ) Case No 2:13-cr-00304-JCM-CWH  
                                )  
Plaintiff,                 ) **Stipulation to Extend Time for**  
                                ) **Government's Response to Defendant's**  
vs.                         ) **Compassionate Release Motion**  
                                )  
CHAD LOFTIN,                 )  
                                )  
Defendant.                 )  
                                )

IT IS HEREBY STIPULATED AND AGREED, by and between Assistant United States Attorney Elizabeth O. White, counsel for the United States of America; and Assistant Federal Public Defender Heidi Ojeda, counsel for Chad Loftin, that the government's response to Mr. Loftin's Emergency Motion for Order Reducing Sentence to Time Served, and Modifying Judgment under 18 U.S.C. § 3582 (c)(1)(A)(i) to Extend Period of Supervised Release, With a Portion of That Time to be Served on Home Confinement (ECF No. 134) be extended to and including July 13, 2020.

This stipulation is entered into for the following reasons:

1. Mr. Loftin filed his motion on July 1, 2020. ECF No. 134.

1       2. Pursuant to the District Court's General Order Regarding such motions, the  
2 government's response is currently due on July 6, 2020.

3       3. Undersigned government counsel has been out of the district on annual leave  
4 for the Independence Day holiday weekend since July 1, and will return to the office on  
5 Wednesday, July 8. When she returns, she believes she will need an additional 5 days, to  
6 and including July 13, 2020, to review the motion, related medical records, and other  
7 records, and prepare and file the government's response.

8       4. Loftin's counsel consents to this extension of time.

9              DATED this 5th day of July, 2020.

10             RENE L. VALLADARES  
11             Federal Public Defender

12             NICHOLAS A. TRUTANICH  
13             United States Attorney

14       By: s/ Heidi Ojeda  
15             Heidi Ojeda  
16             Asst. Federal Public Defender  
17             *Counsel for Chad Loftin*

18       By: s/ Elizabeth O. White  
19             Elizabeth O. White  
20             Assistant United States Attorney  
21             *Counsel for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the government's response to Defendant's Emergency Motion for Order Reducing Sentence to Time Served, and Modifying Judgment under 18 U.S.C. § 3582 (c)(1)(A)(i) to Extend Period of Supervised Release, With a Portion of That Time to be Served on Home Confinement (ECF No. 134) be due on July 13, 2020.

DATED July 6, 2020.

James C. McRae  
UNITED STATES DISTRICT JUDGE